

December 4th, 2015

The Honorable Sylvia Mathews Burwell, Secretary
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dear Secretary Burwell,

The undersigned organizations appreciate the opportunity to comment on Arizona's proposed waiver extension application. Although we support Arizona's decision to extend their 1115 waiver providing Medicaid coverage to low-income parents, children and other adults, we have substantial concerns regarding the state's request for an exemption from providing mandatory nonemergency medical transportation for a portion of the Medicaid population.

The request to waive NEMT services does not have an evaluation component, a requirement for 1115 waivers. Other states that have proposed to waive NEMT services include a hypothesis that lack of NEMT will not pose a barrier to accessing medical services. Thus far, results from those evaluations have shown that lack of NEMT **is** a barrier and that new Medicaid beneficiaries rely on NEMT at similar rates as traditional beneficiaries.

Even more problematic, the exemption from NEMT services does not provide an exclusion for individuals with severe, chronic conditions including the severely mentally ill (SMI). Evidence has shown a strong link between individuals with chronic health needs and a need for NEMT. In addition to individuals with SMI, this includes individuals in need of dialysis and cancer treatment. Additionally, persons with disabilities may have special transportation needs and barriers that require specialized vehicles and additional safety measures.

This is Arizona's third attempt to receive a waiver of NEMT since August 2010. We thank CMS for twice denying this request and ask the agency to again preserve this important benefit for all Medicaid beneficiaries.

Sincerely,

The Community Transportation Association of America
Arizona Medical Transportation Association
Children's Health Fund
Dialysis Patient Citizens
Health Outreach Partners
Mothers of Seriously Mentally Ill of Arizona
National Association of Community Health Centers
Protecting Arizona's Family Coalition